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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

THE CENTER FOR INVESTIGATIVE
 REPORTING AND PATRICK MICHELS,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND
 SECURITY,

Defendant.

Case No. 4:18-CV-02711 DMR

**STIPULATION TO EXTEND THE
 PERIOD FOR FILING A STATUS
 REPORT BY TWO WEEKS
 [PROPOSED] ORDER**

On November 7, 2019, the Court ordered the parties to file a status report. (ECF 46.) The parties stipulated that defendant would release the disputed Freedom of Information Act (“FOIA”), 5 U.S.C § 552(a)(4)(B), Exemption (b)(5) third-party consultant material by October 18, 2019. (ECF 43.) The parties also stipulated to dismiss all FOIA claims, with exception of the issue of attorney’s fees. *Id.* Later the parties stated that they needed additional time, until November 26, 2019, to resolve certain issues that arose after defendant released the Exemption (b)(5) material on October 18. (ECF 45.) The parties also agreed to endeavor to resolve the attorney’s fees issue by that date. *Id.*

The parties have been engaged in a meaningful meet and confer process, and have resolved all the issues that arose after defendant made its release on October 18, 2019. The only issue remaining is attorney’s fees, which the parties are endeavoring to resolve through the meet and confer process.

Therefore, the parties hereby stipulate and respectfully request to extend the period for filing a status report by two weeks, to December 11, 2019, in order to resolve the issue of attorney's fees.

Respectfully submitted,

DAVID L. ANDERSON
United States Attorney

November 26, 2019

By: _____/s/_____
GIOCONDA R. MOLINARI
Assistant United States Attorney

D. VICTORIA BARANETSKY
The Center for Investigative Reporting

November 26, 2019

By: _____/s/*_____
D. VICTORIA BARANETSKY
The Center for Investigative Reporting
Attorney for Plaintiffs

**In compliance with Civil Local Rule 5-1(i), the filer of this document attests that all signatories listed have concurred in the filing of this document.*

[~~PROPOSED~~] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED

DATED: December 3, 2019



HON. DONNA M. RYU
United States Magistrate Judge